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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 AHMAD MUSA JEBRIL,  
D-2 MUSA ABDALLAH JEBRIL,

Defendants.

05X70840

Criminal No. 03-80810

Honorable Gerald E. Rosen

SUBHIEH JEBRIL'S PETITION TO  
ADJUDICATE THE VALIDITY OF  
HER INTEREST IN  
4909 ROSALIE, DEARBORN, MICHIGAN

U.S. DIST. COURT CLERK  
EAST DIST MICH.  
DETROIT-PSB

05 MAR -8 AM 1:42

FILED

NOW COMES Petitioner, Subhieh Jebril, by and through her attorney, Jorin G. Rubin the following:

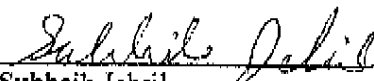
1. I am the wife of Musa Abdallah Jebril. We were married in 1964 and are still married to this day.
2. On October 18, 1967, my husband and I purchased the property located at 4909 Rosalie, Dearborn, Michigan and assumed the existing mortgage secured by the property (hereinafter the "subject property"). We received a warranty deed related to the subject property.
3. My interest in the subject property is based on the fact that the title is in my name with my husband. Under Michigan law, my husband and I own the subject property as tenants by the entireties which prevents its forfeiture. *See U.S. v. 2525 Leroy Lane*, 910 F. 2d 343 (6<sup>th</sup> Cir. 1990), *cert. denied*, 111 S.Ct. 1414 (1991).
4. I do not know of any acts conducted by the Defendants that would give rise to the forfeiture of the subject property.

5. Based on my ownership interest in the subject property, the property cannot be forfeited to the government.

6. Pursuant to 21 U.S.C. §853(n)(6)(A) and (B), I have a legal right, title and/or interest recognized by law that is superior to that of the Defendants at the time the alleged commission of the acts occurred which gave rise to this forfeiture and I am a bona fide purchaser of the subject property without reason to believe that the property was subject to forfeiture.

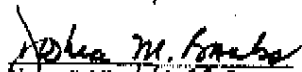
WHEREFORE, Petitioner, Subheih Jebril, seeks to have her ownership interest in the subject property adjudicated by the Courts and have the forfeiture action against this property dismissed in its entirety.

I declare, under penalty of perjury, that the facts contained in this Petition are true to the best of my ability and information.


  
Subheih Jebril

Subscribed and sworn to before me on

this 3 day of March, 2005.

  
Notary Public, Wayne County  
My commission expires 06-11  
**NOTARY PUBLIC, STATE OF MI**  
**COUNTY OF WAYNE**  
**MY COMMISSION EXPIRES JULY 11, 2011**  
**SEVEN IN COUNTY OF Oakland**

Respectfully submitted,

  
Jorin G. Rubin (P60867)  
Law Office of Jorin G. Rubin, PC  
Attorney for Plaintiff  
26711 Northwestern Hwy, Suite 200  
Southfield, MI 48034  
(248) 799-9100

Dated: March 3, 2005